

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW MEXICO**

**In Re: Santa Fe Natural Tobacco Company  
Marketing & Sales Practices Litigation**

Lead Case No. 1:16-md-02695-JB-LF

*This Document Relates to All Actions*

**DECLARATION OF MICHAEL R. REESE**

Pursuant to 28 U.S.C. § 1746, I, Michael Reese, declare as follows:

1. I am a partner at the law firm of Reese LLP and counsel for Plaintiffs in the above-captioned action. I offer this declaration in support of Plaintiffs' Supplemental Brief in Opposition to Defendants' Motion to Dismiss.

2. The facts set forth in this declaration are based upon my personal knowledge and I could competently testify to them if called upon to do so.

3. Attached hereto as Exhibit 1 is a true and correct copy of R.J. Reynolds Tobacco Co., Notes/Excerpts From Santa Fe Newsclips.

4. Attached hereto as Exhibit 2 is a true and correct copy of a Philip Morris USA Inter-Office Communication from Martin Wood dated November 6, 1995.

5. Attached hereto as Exhibit 3 is a true and correct copy of R.J. Reynolds Tobacco Co. document re: American Spirit.

6. Attached hereto as Exhibit 4 is a true and correct copy of the Second Amended Complaint in *Williams v. Gerber Products Co.*, Civ. Action No. 05 CV 1278 JM (JFS) (S.D. Cal.).

7. Attached hereto as Exhibit 5 is a true and correct copy the Complaint in *Martin v. Tradewinds Beverage Company*, Case No. 16-cv-09249 (C.D. Cal.).

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on June 30, 2017 at Holmes Beach, Florida.

/s/ Michael R. Reese  
Michael R. Reese